

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**In re:** :  
: **Case No.: 18-17532**  
**Sarah Anne Washco** : **Chapter 13**  
**Debtor(s)** : **Judge Jean K. FitzSimon**  
: **\*\*\*\*\***

**OBJECTION OF GOVERNMENT LOAN SECURITIZATION TRUST 2011-FV1 BY  
U.S. BANK NATIONAL ASSOCIATION, AS CO-TRUSTEE AND U.S. BANK TRUST  
NATIONAL ASSOCIATION AS DELAWARE TRUSTEE TO CONFIRMATION OF  
THE AMENDED PLAN (DOCKET NUMBER 32)**

Government Loan Securitization Trust 2011-FV1 by U.S. Bank National Association, as Co-Trustee and U.S. Bank Trust National Association as Delaware Trustee ("Creditor") by and through its undersigned counsel, objects to the confirmation of the currently proposed Amended Chapter 13 Plan ("Plan") filed by Sarah Anne Washco ("Debtor") as follows:

1. Creditor holds a security interest secured by a mortgage lien on Debtor's property commonly known as 2118 Delmar Drive, Folcroft, PA 19032 ("Property").
2. Creditor has filed Proof of Claim number 10 in the amount of \$193,524.60, and including a pre-petition arrearage in the amount of \$58,457.60.
3. Debtor's Plan appears to include Creditor's claim in Part 3, Priority Claims. Such treatment will not adequately provide for payment of Creditor's secured claim.
4. At the same time, Debtor's Plan does not provide for the repayment of arrears and maintenance of ongoing monthly payments under Part 4, Secured Claims.
5. As a result, Debtor's Plan fails to meet the requirements of 11 U.S.C. §1325(a)(5) as it fails to provide for a secured claim. Creditor requests that Debtor amend the Plan to either provide for Creditor's claim or to surrender their interest in the Property.

WHEREFORE, Creditor respectfully requests that the Court deny the confirmation of the Debtor's currently proposed Amended Plan.

Respectfully submitted,

/s Karina Velter

Karina Velter, Esquire (94781)

Adam B. Hall (323867)

Sarah E. Barngrover (323972)

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Attorneys for Creditor

The case attorney for this file is Karina Velter.

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing Objection of Government Loan Securitization Trust 2011-FV1 by U.S. Bank National Association, as Co-Trustee and U.S. Bank Trust National Association as Delaware Trustee to the Confirmation of the Amended Plan was served on the parties listed below via e-mail notification:

United States Trustee, Office of the U.S. Trustee, 833 Chestnut Street, Suite 500,  
Philadelphia, PA 19107

Scott Waterman, Chapter 13 Trustee, Chapter 13 Trustee, 2901 St. Lawrence Ave., Reading,  
PA 19606

The below listed parties were served via regular U.S. Mail, postage prepaid, on April 30,  
2019:

Sarah Anne Washco, 2118 Delmar Dr., Folcroft, PA 19032

Sarah Anne Washco and Joseph Ralph Washco, 2118 Delmar Drive, Folcroft, PA 19032

DATE: 4/30/19

/s Karina Velter  
Karina Velter, Esquire (94781)  
Adam B. Hall (323867)  
Sarah E. Barngrover (323972)  
Manley Deas Kochalski LLC  
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Attorneys for Creditor

The case attorney for this file is Karina  
Velter.  
Contact email is [kvelter@manleydeas.com](mailto:kvelter@manleydeas.com)